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July 16, 2020

VIA ECF

Hon. Colleen McMahon
Chief Judge, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Daniel Rivera*, 19 Cr. 759 (CM)

Dear Judge McMahon:

I am the attorney for the defendant, Daniel Rivera, having been duly appointed pursuant to the Criminal Justice Act. The case is presently calendared for a suppression hearing on Thursday, July 30, 2020 at 10 AM. With no objection by the Government, I am requesting that the hearing be adjourned to September 30, 2020 at 10 AM. This request is necessitated by several circumstances including the unexpected vacating of my office and a move into storage the last week of July, my isolation at my house in Massachusetts until at least September due to the COVID virus, the inability to physically meet with my client, and many other work commitments, including an appeal, that will take up much of my time in August and early September. We consent to an exclusion under the Speedy Trial Act.

Thank you for Your attention and consideration.

Very truly yours,

/s/ Irving Cohen
IRVING COHEN